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September 20, 1999

REC'D TN
REGULATORY AUTH.

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EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Petition for Arbitration of ICG
Docket No. 99-00377

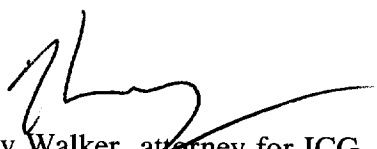
Dear David:

Please find enclosed an original and thirteen copies of ICG Telecom's Objections to BellSouth's First Set of Interrogatories in the above captioned proceeding pursuant to the Order of the Pre-Arbitration Officer dated September 13, 1999.

Thank you for your assistance in this matter.

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker, attorney for ICG

HW/nl

cc: Guy Hicks, attorney for BellSouth

FILE

Objections to Interrogatories

INTERROGATORY NO. 3: Identify each person whom you have consulted as an expert in anticipation of this arbitration or in preparation for a hearing in this arbitration who is not expected to be called as a witness. With respect to each such expert, please state the facts known by and opinions held by this expert concerning any matters raised in the Arbitration Petition.

OBJECTION: ICG objects on the grounds that the requested information is not discoverable. See TRCP Rule 26.02(4)(B).

INTERROGATORY NO. 4: Identify all documents which refer or relate to any issues raised in the Arbitration Petition that were provided or made available to any expert identified in response to Interrogatory Nos. 2 or 3.

OBJECTION: ICG objects to the extent that this Interrogatory refers to experts requested under Interrogatory No. 3, on the same basis given in objection to Interrogatory No. 3.

INTERROGATORY NO. 26: Identify all agreements between ICG and an Incumbent Local Exchange Carrier under Section 252 of the Act, whether the agreement was entered into through voluntary negotiation or compulsory arbitration. In answering this request, please:

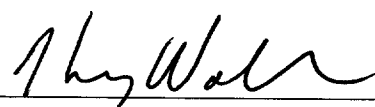
- (a) identify the Incumbent Local Exchange Carrier that is a party to each such agreement;
- (b) state the effective date of each such agreement; and
- (c) state the expiration date of each such agreement.

OBJECTION: ICG objects on the grounds that the information is as available to BellSouth as it is to ICG. All agreements are on file with the regulatory bodies governing the states where ICG does business, namely, Alabama, Georgia, North Carolina, Tennessee, Kentucky, Florida, Texas, Colorado, California and Ohio.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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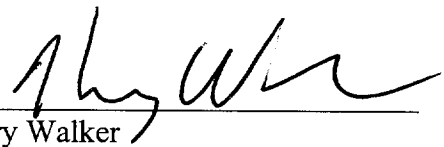
Attorney for ICG Telecom Group, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing ICG Telecom Group, Inc.'s Objections to BellSouth Telecommunications, Inc.'s Discovery Requests was furnished by (*) hand delivery or U.S. Mail to the following parties of record this 20th day of September, 1999:

*Richard Collier, Esq.
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0500

*Guy M. Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300


Henry Walker